

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

**YOUNG CONSERVATIVES OF TEXAS  
FOUNDATION**

*Plaintiff,*

**V.**

**THE UNIVERSITY OF NORTH TEXAS,  
THE UNIVERSITY OF NORTH TEXAS  
SYSTEM, NEAL SMATRESK,  
PRESIDENT OF THE UNIVERSITY OF  
NORTH TEXAS and SHANNON  
GOODMAN, VICE PRESIDENT FOR  
ENROLLMENT OF THE UNIVERSITY  
OF NORTH TEXAS,**

***Defendant.***

**CIVIL ACTION NO. 4:20-cv-00973**

## JOINT MOTION FOR CONSOLIDATED BRIEFING SCHEDULE

Defendants, the University of North Texas, the University of North Texas System, Neal Smatresk, President of the University of North Texas, and Shannon Goodman, Vice President for Enrollment of the University of North Texas (collectively “UNT” or “Defendants”), jointly with Plaintiff, Young Conservatives of Texas Foundation (“YCT” or “Plaintiff”) (each individually a “party” and collectively the “Parties”), respectfully submit this Joint Motion for Consolidated Briefing Schedule.

Pursuant to the Scheduling Order entered in this matter (Dkt. No. 33) and the Court's Memorandum Opinion and Order denying Defendants' Motion to Dismiss (Dkt. No. 34), the deadline for completion of discovery in this matter is **December 28, 2021**. The Parties are also in

receipt of the Court's Order setting the deadlines for the briefing on Plaintiff's Motion for Summary Judgment and any other dispositive motions (Dkt. No. 35) as follows:

- UNT's response to Young Conservatives motion for summary judgment (Dkt. No. 6) is currently due on November 18, 2021.
- Young Conservatives' reply, if any, is currently due on November 26, 2021, and UNT's sur-reply, if any, is currently due December 3, 2021.
- Any other dispositive motions, by either party, must be filed on or before January 18, 2022.

In light of the fact that discovery is ongoing, including depositions and written discovery, and cannot be completed prior to the above deadlines related to Young Conservatives' motion for summary judgment, the Parties have conferred and agree to consolidate the briefing schedule for YCT's motion for summary judgment (Dkt. No. 6) and any UNT cross-dispositive motion. The Parties agree that the page limitations for each motion, response, reply, and sur-reply shall remain unchanged and will individually comply with Local Rule CV-7. The Parties have agreed to and propose the following consolidated briefing schedule:

1. UNT's consolidated response to Young Conservatives' motion for summary judgment (Dkt. No. 6) and cross-dispositive motion will be due on or before January 18, 2022.
2. YCT's consolidated reply in support of its motion for summary judgment and response to UNT's cross-motion for summary judgment will be due February 8, 2022.
3. UNT's consolidated sur-reply to YCT's motion for summary judgment and reply in support of its cross-dispositive motion will be due February 15, 2022.
4. YCT's sur-reply, if any, to UNT's cross-dispositive motion will be due February 22, 2021.

This request for a consolidated briefing schedule is not sought for purposes of delay and will not prejudice any party to this action.

Date: November 16, 2021

Respectfully submitted,

By: /s/ Andy Taylor

Andy Taylor

**ANDY TAYLOR & ASSOCIATES, P.C.**

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**ATTORNEYS FOR THE DEFENDANTS  
UNIVERSITY OF NORTH TEXAS, THE  
UNIVERSITY OF NORTH TEXAS SYSTEM,  
NEAL SMATRESK, PRESIDENT OF THE  
UNIVERSITY OF NORTH TEXAS, AND  
SHANNON GOODMAN, VICE PRESIDENT FOR  
ENROLLMENT OF THE UNIVERSITY OF  
NORTH TEXAS**

**CERTIFICATE OF CONFERENCE**

Counsel for Plaintiff and Defendants conferred on November 16, 2021 regarding the foregoing and agreed to file this Joint Motion for Consolidated Briefing Schedule.

By: /s/ Sandy Hellums-Gomez  
Sandy Hellums-Gomez

**CERTIFICATE OF SERVICE**

I certify that a copy of this motion has been served upon the following on this the 17th day of November, 2021:

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